

EXHIBIT 2

In the Matter Of:

Freeman vs

Deebs-Elkenaney

TRENT BAER

March 21, 2023



1 A. I'm not going to speculate on that.

2 Q. Put it simply, if Tracy Wolff wrote: "I'm
3 not an idiot" in June 2010, before your wife sent
4 the manuscripts in October 2010, then this simple
02:09 5 similarity here is just a coincidence; right?

6 A. This particular one could be.

7 Q. And all 56 of the examples in this exhibit,
8 if it is true that Tracy Wolff wrote Tempest Rising
9 in June 2010, are just coincidences; right?

02:09 10 A. Well, can I ask you when was the final
11 draft of Tempest Rising?

12 Q. So as I represented -- and we can do it as
13 a hypothetical if you want. But as I represented,
14 Tracy Wolff stated, in her sworn declaration under
02:10 15 oath, that the final draft was completed in
16 June 2010.

17 All I'm asking is if that is true -- and
18 I'm not asking you to acknowledge it's true -- but
19 if that is true, then all 56 examples in this
02:10 20 exhibit, involving Tempest Rising, would have to
21 just be coincidences; right?

22 A. If that is true.

23 Q. You can put that one away.

24 Are you familiar with a book called

02:11 25 Dark Embers by Tessa Adams?